

1 NIHAT DENIZ BAYRAMOGLU, ESQ.
(Nevada. Bar No. 14030)
2 Deniz@bayramoglu-legal.com
BAYRAMOGLU LAW OFFICES LLC
3 1540 West Warm Springs Road, Suite 100
Henderson, Nevada 89014
4 Telephone: 702.462.5973
Facsimile: 702.553.3404
5 Attorney for *WINNER'S SUN PLASTIC &*
ELECTRONIC (SHENZHEN) CO. LTD.

6 HAO NI (pro hac vice to be filed)
hni@nilawfirm.com
7 **NI, WANG & MASSAND, PLLC**
8 8140 Walnut Hill Lane, Suite 500
Dallas, TX 75231 Telephone: (972) 331-4600
9 Facsimile: (972) 314-0900

10 Attorneys for Defendant
ERLIGPOWHTDIRECT

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 WINNER'S SUN PLASTIC &
15 ELECTRONIC (SHENZHEN) CO.
16 LTD., a Chinese Limited Company,
Plaintiff,

17 v.

18 THE PARTNERSHIPS and
19 UNINCORPORATED ASSOCIATIONS
20 IDENTIFIED ON SCHEDULE "B"

21 ,
Defendant.

Case No. 2:19-cv-00980-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

Pursuant to Local Rules of Practice for the United States District Court for the District of Nevada L.R. 1.A 6-1, 6-2, and L.R. 7-1, Plaintiff WINNER'S SUN PLASTIC & ELECTRONIC (SHENZHEN) CO. LTD. ("Plaintiff"), and Defendant ERLIGPOWHTDIRECT ("Defendant") by and through its counsel hereby stipulate and agree to extend the time for this and only this Defendant to answer or otherwise respond to Plaintiff's Complaint by 21 days to March 5, 2020. This is the Parties' first request.

Defendant is a foreign Chinese company and its business and employees have been currently indisposed due to the coronavirus outbreak. The Parties therefore stipulate to this extension while the Parties discuss whether an early resolution is possible. Defendant shall answer or otherwise respond to Plaintiff's Complaint by March 5, 2020.

The requested extension of time is sought in good faith and not for purposes of causing any undue delay.

Dated this 11th day of February, 2020.

/s/ Nihat Deniz Bayramoglu

NIHAT DENIZ BAYRAMOGLU, ESQ.

Attorney for *WINNER'S SUN PLASTIC & ELECTRONIC (SHENZHEN) CO. LTD.*

Approved as to form:

/s/ Hao Ni

Hao Ni
Attorney for Defendant
ERLIGPOWHTDIRECT


STIPULATION AND ORDER TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S
COMPLAINT
2:19-CV-00980-RFB-DJA

1
2
3 **ORDER**

4 Good cause appearing, the motion is GRANTED. Defendant ERLIGPOWHTDIRECT's
5 time to answer or otherwise respond is extended to March 5, 2020

6 IT IS SO ORDERED.

7
8 Date: February 14, 2020

9 
10 Daniel J. Albregts
11 United States Magistrate Judge
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28